REMARKS

I. Status of Claims

The Applicants have carefully considered the Office Action dated April 13, 2009, and the references it cites. Currently, claims 1-10 are pending in this application. The Examiner rejects:

- claims 1-10 under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite;
- claims 1-3 and 6-8 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,639,915 to Tsztoo et al. (*Tsztoo*) in view of U.S. Patent No. 5,907,542 to Kuehnel et al. (*Keuhnel*); and
- claims 4-5 and 9-10 as being unpatentable over *Tsztoo* in view of *Kuehnel* and in further view of U.S. Patent No. 6,201,789 to Witkowski et al. (*Witkowski*).

In response, the Applicants submit the foregoing amendments and the following remarks.

II. Claim Rejections Under 35 U.S.C. § 112, second paragraph

In response to the rejections under 35 U.S.C. § 112, second paragraph, the Applicants submit the foregoing claim amendments for clarity and, therefore, no estoppel is created. Withdrawal of all rejections under 35 U.S.C. § 112, second paragraph is respectfully requested.

III. Claim Rejections Under 35 U.S.C. § 103(a)

Claim 1 recites a symbol buffer memory device comprising, *inter alia*, a buffer memory for storing the symbol data for the logical channel according to input sequences so that the symbol data of the logical channels are stored in a continuous arrangement and a start address table for storing address information according to the logical channels, each of the address information indicating a location of initial symbol data corresponding to each of the logical channels from among the symbol data stored in the buffer memory.

Applicants submit that *Tsztoo* fails to describe a buffer memory for storing the symbol data for the logical channel according to input sequences so that the symbol data of the logical channels are stored in a continuous arrangement. As previously noted, Applicants previously explained that the *third embodiment* of *Tsztoo*, which the Examiner relies upon to

reject claim 1, merely describes storage locations corresponding to various CHANNEL# values and does not store the data in a continuous arrangement.

In response, the Examiner contends that FIG. 7 illustrates that the data is stored in continuous arrangement. However, FIG. 7 corresponds to the *first and second embodiment* of *Tsztoo*. Specifically, "FIG. 7 can illustrates [sic] an example of out-going voice data stored in the buffer system (306 and 406)." *See Tsztoo at 10:34-36.* Applicants submit that the buffer system 306 and 406 are related to the first and second embodiments. As noted by the Examiner, FIG. 7 illustrates that the data stored therein is stored at predetermined locations. By contrast, *Tsztoo* states that the third embodiment:

> can advantageously store voice data in the VPBM 934 in groups according to various channel identifying information. Voice channel data for a common destination location can then be commonly situated into a single outgoing packet. Such an arrangement can allow for more efficient and/or more rapid processing of voice data.

See Tsztoo at 17:7-13. Applicants submit that this description of the third embodiment of *Tsztoo* appears to correspond to FIG. 8, which illustrates that the data is not stored continuously. For example, the bin 800 includes two payloads (VD16 and VD17) whereas the bin 802 includes three payloads (VD19, VD18, and VD20). *See Tsztoo at FIG. 8.* Accordingly, *Tsztoo* does not describe a buffer memory for storing the symbol data for the logical channel according to input sequences so that the symbol data of the logical channels are stored in a continuous arrangement.

Turning to the first and second embodiments of *Tsztoo*, FIG. 7 illustrates that a base address indicates a multiplexed header information located in front of a payload (VD) in a contiguous memory. That is, *Tsztoo* describes that the first and second embodiments describe "establishing predetermined locations for voice data according to a particular channel[.]" *See Tsztoo at 10:4-5.* In addition, FIG. 7 is described as "a diagram ... illustrating how a contiguous memory can be divided into non-contiguous portions[.]" *See Tsztoo at 10:17-19.* Accordingly, Applicants submit that *Tsztoo* does not correspond to claim 1, which recites storing the symbol data for the logical channel according to input sequences so that the symbol data of the logical channels are stored in a continuous arrangement. Further, the base address of *Tsztoo* does not describe a start address table for storing address information according to the logical channels, each of the address information indicating a location of initial symbol data as recited in claim 1.
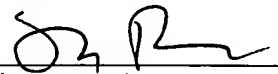
Applicants further submit that the alleged combination is improper. *Tsztoo* relates to wired networks and thereby describes receiving a variety of type of packet data. In particular, FIG. 12 of *Tsztoo* indicates that it can support "Real-Time Transport Protocol (RTP), RTP Control Protocol (RTCP), TCP, RTP Multiplexed Voice, and Internet Control Message Protocol (ICMP)." *See Tsztoo at 18:14-17*. That is, *Tsztoo* describes receiving a plurality of packet types for processing. By contrast, *Keuhnel* describes wireless Asynchronous Transfer Mode (ATM) communication using ATM packets. Thus, the alleged combination would have to encapsulate the packets in an ATM packet for its "scarce resource of over-the-air interfaces." See *Keuhnel at 3:44-47*. By encapsulating the first packet (e.g., TCP) in an ATM packet, the alleged combination now requires two headers, thereby requiring more bandwidth to transmit the packet and decreasing the efficiency of the alleged combination. Accordingly, *Keuhnel* expressly teaches away from the alleged combination as it describes *only* using ATM packets to transmit wireless data.

Further, none of the cited art cure at least the above-noted deficiencies of *Tsztoo*. Thus, for at least the foregoing reasons, claim 1 and all claims depending therefrom would not have been obvious from *Tsztoo* applied alone or in any reasonable combination with *Kuehnel* and/or *Witkowski*. Further, claim 6 and all claims depending therefrom are patentable over the cited references for at least substantially the same reasons discussed above in connection with claim 1.

V. Conclusion

The Applicants submit that the above amendments and arguments are fully responsive to the Office Action dated April 13, 2009. Further, the Applicants submit that, for at least the foregoing reasons, all pending claims are in condition for allowance and notice to that effect is requested. Should the Examiner have any questions, the Examiner is encouraged to contact the undersigned at the telephone number indicated below.

Respectfully submitted,

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